REMARKS

Applicants respectfully request the Examiner's reconsideration of the present application. Claims 1, 12, 16, 23, and 33 have been amended. Entry of the amendments is respectfully requested. Accordingly, claims 1-33 are presented for examination.

Claims Rejected Under 35 U.S.C. §102

Claims 1-5, 7, 9-14, 16-19, 21-25, 27, 28, 30-33 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 5,953,339 issued to Baldwin et al. ("*Baldwin*"). To anticipate a claim, the Examiner must show that a single reference teaches each and every element of that claim.

Among other limitations, independent claim 1 as amended recites "said ingress AAL2 switch engine having a first look-up table that can store: 1) an identification label for establishing a local AAL2 virtual channel through said ATM switch core, and 2) an AAL2 egress connection identification label (EID) for an ingress AAL2 packet to be carried by said AAL2 virtual channel, said egress AAL2 switch engine having a second look-up table that can store the EID, and an egress port number, an egress CID, and an egress VPI/VCI associated with the EID, said egress AAL2 switch engine replaces parts of the ingress AAL2 packet with the egress CID and the egress VPI/VCI, producing an outgoing AAL2 packet." *Baldwin* does not teach or suggest these limitations.

According to the Final Office Action, *Baldwin* discloses an ATM switch that is coupled to a plurality of terminal adaptors (TAs) wherein each terminal adaptor maintains a routing table including an incoming port, VPI/VCI, and CID number, and an outgoing port, VPI/VCI, and CID number (Figure 9; Figure 7). For each arriving LLC packet at TAs 205, LLC Server 200 switches the packets by rebundling the payload portion go the LLC packet into a new LLC packet with a "new" CID and providing this new LLC packet to the appropriate Port on the designated VCC (col. 7, lines 48-53).

Claim 1 is not anticipated by *Baldwin* because *Baldwin* does not teach or suggest an "identification label for establishing a local AAL2 virtual channel" and "AAL2 egress connection identification label (EID)." The Examiner has failed to establish where in *Baldwin* the limitation of an "identification label for establishing a local AAL2 virtual channel" is taught. The Examiner has mistakenly equated the identification label with the port number and that the identification label is

stored in both the first and second look up table. Applicants respectfully submit that the identification label is stored in the first look up table as recited in claim 1.

Furthermore, *Baldwin* does not teach or suggest "said egress AAL2 switch engine replaces the ingress AAL2 packet with the egress CID and the egress VPI/VCI ." As described above, *Baldwin* switches the CID and VPI/VCI value of an incoming AAPL2 packet at the incoming TA 205. Therefore, *Baldwin* fails to disclose that the replacing of CID and VPI/VCI values of an outgoing AAL2 packet occurs at the outgoing TA (e.g. egress switch engine). *Baldwin* does not teach or suggest the limitations of claim 1.

With respect to claims 12 and 23, among other limitations, these claims as amended recite "forwarding at least said ingress AAL2 packet payload and said AAL2 egress connection identification label over a local AAL2 virtual channel established within an ATM switch core, said AAL2 virtual channel identified by said AAL2 virtual channel pipe number; c) replacing the ingress AAL2 packet CID and VPI/VCI by an egress AAL2 switch engine; and d) producing an egress AAL2 packet including an egress CID and an egress VPI/VCI based on said AAL2 egress connection identification label, said egress AAL2 packet carrying said ingress AAL2 packet payload." *Baldwin* does not teach or suggest these limitations.

Similar to discussion with respect to claim 1, *Baldwin* does not disclose establishing a local AAL2 virtual channel identified by an AAPL2 virtual channel pipe number ("identification label" as recited in claim 1). Furthermore, *Baldwin* does not disclose replacing the ingress AAL2 packet CID and VPI/VCI by an egress AAL2 switch engine. The Examiner has mistakenly equated the egress connection identification label with the port number, the CID, and the VPI/VCI value needed for an outgoing (e.g. egress) AAL2 packet. As recited in claims 12 and 23, "producing an egress AAL2 packet including an egress CID and an egress VPI/VCI based on said AAL2 egress connection identification label," the AAL2 egress connection identification label is used to identify a particular set of egress CID, VPI/VCI, and port number. Therefore, the AAL2 egress connection identification label is not an egress CID, an egress VPI/VCI, and an egress port number. Accordingly, *Baldwin* does not teach or suggest the limitations of claims 12 and 23.

With respect to claim 32, claim 32 as amended recites "said AAL2 egress connection identification label can be forwarded over a local AAL2 virtual channel established within an ATM switch core." *Baldwin* fails to disclose that a local AAL2 virtual channel is established. Therefore, *Baldwin* does not teach or suggest the limitations of claim 32.

With respect to claim 33, claim 33 as amended recites "replacing an ingress AAL2 packet with an egress CID and an egress VPI/VCI; producing an egress AAL2 packet based on the replacement in response to an AAL2 egress connection identification label, at an egress switch engine." Similar to the discussion with respect to claims 1, 12, and 23, *Baldwin* does not disclose replacing an ingress AAL2 packet with an egress CID, an egress VPI/VCO, and an egress port number at an egress switch engine." Therefore, *Baldwin* does not teach or suggest the limitations of claim 33.

Dependent claims 1-5, 7, 9-11, 13, 14, 16-19, 21, 22, 24, 25, 27, 28, 30, 31 depend from claims 1, 12, and 23 and are not anticipated for at least the reasons given above in support of their base claims. Accordingly, Applicants respectfully request that rejection of 1-5, 7, 9-14, 16-19, 21-25, 27, 28, 30-33 be considered and withdrawn.

Claims Rejected Under 35 U.S.C. §103(a)

Claims 6, 8, 15, 20, 26, 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Baldwin*. To establish a *prima facie* case of obviousness, the Examiner must show the cited references, combined, teach or suggest each of the elements of a claim.

These claims depend from independent claims 1, 12, 23 and 33 and therefore are not obvious, for at least the reasons give above in support of their base claims. In particular, *Baldwin* fails to disclose "identification label for establishing a local AAL2 virtual channel through said ATM switch core" and "said egress AAL2 switch engine replaces the ingress AAL2 packet with the egress CID, and the egress VPI/VCI." Because *Baldwin* does not teach or suggest these limitations, *Baldwin* does not teach or suggest the limitations of claims 6, 8, 15, 20, 26, 29.

Accordingly, Applicants respectfully request that rejection of claims 6, 8, 15, 20, 26, 29 be considered and withdrawn.

CONCLUSION

In view of the forgoing, it is believed that all claims now pending, namely claims 1-33 are in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional frees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666. Questions regarding this matter should be directed to the undersigned at (310) 207-3800.

Respectfully submitted,

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Date: March 27, 2006

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

March 27, 2006
Date

GAYLE V. VINSON